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February 6, 2015

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VIA ECF

United States District Court
Honorable Nina Gershon
225 Cadman Plaza East
Brooklyn, NY 11201

Re: **Sabella v. ASI et al. – Notice of Settlement in Principle**
No. 06-CV-6566 (NG) (SMG)

Dear Judge Gershon,

This firm represents plaintiff, Michael Sabella, in the above-referenced civil action. Sabella and defendant American Stevedoring, Inc. ("ASI") respectfully request a two-week extension of the deadline to submit opposition briefs regarding the cross-motions between Sabella and ASI. The current deadline is today, February 6, 2015.

The request is made due to the fact that Plaintiff and ASI have had productive settlement talks which are fully expected to result in a settlement between the two parties. The parties are expending all efforts to reach this amicable resolution, and expect to do so within the next two weeks. Ms. Bauer, attorney for defendant ASI, consents to this request.

This request would amend the briefing schedule with regard to plaintiff's and ASI's cross-motions as follows: opposition papers, if necessary, would be due by February 20, 2015, and reply papers, if necessary, would be due by February 27, 2015.

Thank you for the Court's attention to this matter.

Respectfully submitted,

LEVINE & BLIT, PLLC



Russell S. Moriarty

*Application granted,
so ordered*
s/Nina Gershon
USDJ
2-9-15